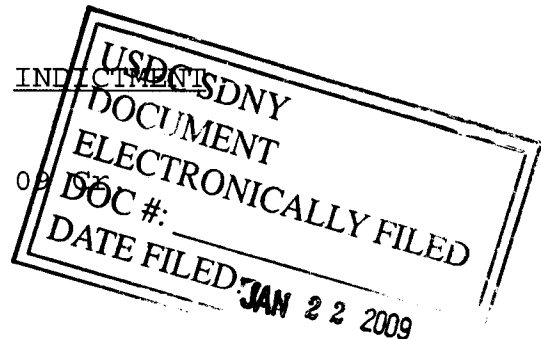


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
WILLIAM G. TROPER, :
a/k/a "Billy Troper," :
:
Defendant. :
----- -x



COUNT ONE

The Grand Jury charges:

1. From at least in or about September 2005, through on or about December 22, 2008, in the Southern District of New York and elsewhere, WILLIAM G. TROPER, a/k/a "Billy Troper," the defendant, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, and attempting so to do, did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and did take and receive therefrom, such matter and thing, and did knowingly cause to be delivered by mail according to the direction thereon, such matter and thing, to wit, TROPER caused thousands of notices to be mailed to individuals located throughout the United States that falsely threatened the recipients of the notices with criminal charges for purportedly issuing fraudulent checks that had not in fact been issued,

thereby inducing the recipients to send money to TROPER in New York, New York, to avoid the threatened criminal charges.

(Title 18, United States Code, Sections 1341 and 2).

COUNT TWO

The Grand Jury further charges:

2. From at least in or about September 2005, through on or about December 22, 2008, in the Southern District of New York and elsewhere, WILLIAM TROPER, a/k/a "Billy Troper," the defendant, unlawfully, willfully, and with intent to extort from a person money and another thing of value, knowingly did deposit and cause to be delivered in a post office and authorized depository for mail matter, to be sent and delivered by the Postal Service and knowingly did cause to be delivered by the Postal Service according to the direction thereon, a communication, with and without a name and designating mark subscribed thereto, addressed to another person and containing a threat to accuse the addressee and another person of a crime, to wit, TROPER caused thousands of notices to be mailed to individuals located throughout the United States, with the intent to extort money from those individuals by fraudulently threatening said individuals with criminal charges for issuing purportedly fraudulent checks that had not in fact been issued.

(Title 18, United States Code, Sections 876(d) and 2).

FORFEITURE ALLEGATION

3. As the result of committing the mail fraud offense in violation of 18 U.S.C. § 1341, alleged in Count One of this Indictment, WILLIAM G. TROPER, a/k/a "Billy Tropper," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C § 2461, all property, real and personal, that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of the offense, including but not limited to the following:

a. At least \$ 1,300,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the mail fraud offense charged in Count One.

Substitute Asset Provision

b. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

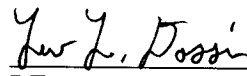
(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.
§ 853(p), to seek forfeiture of any other property of said
defendant(s) up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and 1341;
Title 21, United States Code, Section 853(p);
Title 28, United States Code, Section 2461.)


FOREPERSON


LEV L. DASSIN *MAA*
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

WILLIAM G. TROPER,
a/k/a "Billy Troper,"

Defendant.

INDICTMENT

09 Cr.

(18 U.S.C. §§ 876(d), 1341 and 2)

LEV L. DASSIN
Acting United States Attorney.

A TRUE BILL


Foreperson.
